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June 24, 2020

VIA ECF

Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re. United States v. Dilber Kukic, Crim. No. 17-404 (KAM)

Dear Judge Matsumoto:

We represent Defendant Dilber Kukic in the above-captioned case. We write to respectfully request an adjournment of the sentencing date for Mr. Kukic, which is currently scheduled for July 28, 2020, to a date during the week of September 21, 2020 (or a date thereafter that is convenient for the Court, dependent, of course, of the state of the COVID-19 pandemic at such time). We have spoken with the Government regarding the instant sentencing adjournment request and they consent.

The COVID-19 pandemic has significantly interfered with in-court legal proceedings in the Eastern District of New York (“EDNY”). We understand that, except for urgent matters, no in-court appearances have taken place in the EDNY since the COVID-19 pandemic hit New York. Rather, all non-urgent court appearances have taken place remotely (such as through Zoom video conferences). Due to the complex nature of a sentencing proceeding, as well as Mr. Kukic’s unique personal circumstances (which we will detail in our sentencing memoranda to be filed in advance of sentencing), we firmly believe that a remote video sentencing would impair our ability to zealously represent Mr. Kukic at sentencing.

For all of the foregoing reasons, we respectfully request that this Court adjourn the sentencing hearing of Mr. Kukic from July 28, 2020 to a date during the week of September 21, 2020 (or a date thereafter).

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We thank the Court for its courtesy in this and all other matters.

Respectfully submitted,

/s/
Joshua D. Kirshner

cc: All parties (via ECF)